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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

ROANE HOLMAN, and all others similarly
situated,

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Case No. CV-11-00180-CW

Assigned to the Honorable
Claudia Wilken

**STIPULATION AND ~~(PROPOSED)~~
ORDER RE DATE FOR
SUBMISSION OF DISPUTED
CLAIMS TO THE OMBUDSMAN**

Defendant Experian Information Solutions, Inc. ("Experian"), and Plaintiffs jointly submit this Stipulation to Stay the Proceedings.

WHEREAS, the Order Preliminarily Approving Class Action Settlement, Directing Notice to the Class and Setting Hearing for Final Approval of the Settlement, Doc 257 (the "Order") set September 2, 2014, as the deadline for class members to submit their claims to the Claims Administrator;

WHEREAS, the Settlement Administrator has provided counsel a list of about 150 timely claims that were deficient for various reasons;

WHEREAS, class counsel have examined the claims identified as deficient and have determined that a substantial percentage should be approved;

STIPULATION AND ~~(PROPOSED)~~ ORDER RE
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WHEREAS, class counsel have provided Experian's counsel with information regarding claims that class counsel believe should be approved;

WHEREAS, on October 8, 2014, class counsel sent letters to class members whose claims were deemed deficient asking for more information;

WHEREAS, paragraph 7 of the Order states that if there are any unresolved disputes concerning particular claimants, counsel shall forward their disagreements on those claimants to the Ombudsman on or before October 14, 2014;

WHEREAS, the parties need more time to meet and confer concerning the deficient claims before submitting any unresolved disputed claims to the Ombudsman and therefore want to extend the date for submission of such claims to October 21, 2014;

WHEREAS, the change in the date for submission of disputed claims to the Ombudsman will not interfere with the administration of the settlement.¹

NOW, THEREFORE, IT IS HEREBY STIPULATED by the Parties, through their respective counsel of record, that if there are any unresolved disputes concerning particular claimants, counsel shall forward their disagreements on those claimants to the Ombudsman on or before October 21, 2014.

Dated: October 14, 2014.

JONES DAY

By /s/ Daniel J. McLoon
Daniel J. McLoon

Attorneys for Defendant Experian Information
Solutions, Inc.

¹ The reason the parties set October 14, 2014, as the date to submit disputed claims to the Ombudsman was if the total number of approved claims exceeded a certain number, there would be pro-rata reduction in the amount paid to each class member. The number of claims submitted is such that all class members whose claims are approved will get \$375, with no reduction. Paragraph 8 of the Order states that the Settlement Administrator must calculate the cash award each claimant will receive and post the amount on its website by October 31, 2014. There being no prospect of a pro-rata reduction in the amount of each payment, the Settlement Administrator will post on its website that all approved claims will result in a payment of \$375.

1 Dated: October 14, 2014.


ANDERSON, OGILVIE & BREWER LLP

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3 By /s/ Mark F. Anderson
Mark F Anderson

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5 Attorneys for Plaintiffs

6 Pursuant to this stipulation, IT IS SO ORDERED.

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9 Dated: 10/15/2014


The Hon. Claudia Wilken
District Judge of the Northern District of
California